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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$48,500.00 IN U.S.  
15 CURRENCY,

16 Defendants.

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimants  
18 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as  
19 follows:

20 1. On or about September 23, 2020, the Homeland Security Investigations seized the above-  
21 referenced defendant asset pursuant to a State search and seizure warrant (hereafter “defendant asset”).

22 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required  
23 to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or  
24 obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of  
25 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
26 deadline is January 20, 2021.

27 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
28 April 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant asset and/or to obtain an indictment alleging that the defendant asset is subject to  
2 forfeiture.

3 4. Accordingly, the parties agree that the deadline by which the United States shall be  
4 required to file a complaint for forfeiture against the defendant asset and/or to obtain an indictment  
5 alleging that the defendant asset is subject to forfeiture shall be extended to April 20, 2021.

6 Dated: 1/20/2021

McGREGOR W. SCOTT  
United States Attorney

7  
8 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
9 Assistant U.S. Attorney

10  
11 Dated: 1/19/2021

/s/ Mark J. Reichel  
MARK J. REICHEL  
12 Attorney for Potential Claimants  
13 Xiaobing Wang, Min Guo, and Lianfeng Li  
14 (Signature authorized by email)

15  
16 **IT IS SO ORDERED.**

17 Dated: \_\_\_\_\_

\_\_\_\_\_  
18 United States District Judge